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November 14, 2005

VIA HAND-DELIVERY TO:

Chairman Ron Jones
c/o Sharla Dillon, Docket Manager
TENNESSEE REGULATORY AUTHORITY
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

**Re: Review of Nashville Gas Company's IPA Relating To Asset Management Fees,
Docket No. 05-00165.**

Dear Chairman Jones:

Enclosed please find the original and thirteen (13) copies of Nashville Gas Company's First Set of Interrogatories and Request for Production of Documents to The Consumer Advocate to be filed in the above-referenced docket on behalf of our client, Nashville Gas Company, a division of Piedmont Natural Gas Company, Inc. Also enclosed is an additional copy, which I would appreciate your stamping as "filed," and returning to me by way of our courier.

Should you have any questions with respect to this filing, please do not hesitate to contact me.

With kindest regards, I remain

Very truly yours,



R. Dale Grimes

RDG/tn
Enclosures

cc: Timothy Phillips, Esq.
Aaron Rochelle, Esq.
J. Richard Collier, Esq.

IN RE:)	
)	
REVIEW OF NASHVILLE GAS COMPANY'S)	DOCKET NO. 05-00165
IPA RELATING TO ASSET MANAGEMENT)	
FEEs)	

Nashville Gas Company, a division of Piedmont Natural Gas Company, Inc. ("Nashville Gas" or the "Company"), through counsel and pursuant to Rules 26, 33 and 36 of the Tennessee Rules of Civil Procedure, requests that the Consumer Advocate and Protection Division of the Office of Attorney General ("Consumer Advocate") respond to the following discovery requests in the above-captioned docket. Piedmont requests that the Consumer Advocate provide answers to these discovery requests to its counsel, R. Dale Grimes, Esq. at the offices of Bass, Berry & Sims, PLC, Suite 2700, AmSouth Center, Nashville, Tennessee 37238-2700, on or before December 14, 2005 consistent with the schedule established by the Hearing Officer in this docket.

The following definitions shall apply herein:

1. As used herein, the term "document" includes any written, electronic, or graphics matter or communication, however produced, stored, recorded or reproduced, whether the original or a copy, and is intended to be comprehensive and include, without limitation, any and all written correspondence, letters, emails, text messages,

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telegrams, agreements, contracts, notes, memoranda, instructions, reports, financial statements, demands, data, schedules, notices, work papers, drafts, recordings (whether by electronic or other means), photographs, charts, analysis, interoffice communications, notebooks, diaries, daily logs, appointment calendars, sketches, drawings, plans, specifications, blue prints, plats, diagrams, forms, manuals, brochures, lists, publications, minutes of meetings, journals, ledgers, or other financial records, invoices, work tickets, purchase orders, canceled checks, and all other written, electronic or graphic material of any nature whatsoever.

2. "Person" means all natural persons, male or female, and all types and kinds of businesses and other entities; including, but not limited to corporations, partnerships, joint ventures, sole proprietorships, and government agencies.

3. "Communication" means a transfer of information, written, oral, electronic, or by any means whatsoever.

4. "Identify" when used:

(a) With regard to a person, means:

- (1) State the full name;
- (2) State the present or last known residential and business address;
- (3) State the current or last known employer;
- (4) State the current or last known position of employment.

(b) With regard to document, means:

- (1) State the title of the document;
- (2) Identify its author;

(3) Identify all addressees;

(4) State the date of making;

(5) Describe its subject matter;

(6) State whether the document will be produced, and if not, state the basis for any claim of privilege or other basis for your failure to produce the document.

(c) With regard to communication, means;

(1) Identify the participants to the communication;

(2) State the date upon which the communication was made;

(3) Describe the subject matter of the communication;

(4) Describe the manner in which the communication was made
(e.g., telephone call, meeting, letter, memorandum, etc.).

5. "Evidencing" means tending to show, in any probative manner, the existence or nonexistence of any matter.

6. "Consumer Advocate" refers to the Consumer Advocate and Protection Division of the Office of Attorney General for the state of Tennessee, as well as its past and present officers, directors, shareholders, agents, servants and employees.

7. "TRA Staff" refers to those staff employees of the TRA designated to participate as a party in this proceeding.

8. "Advisory Staff" refers to those staff employees of the TRA who have not been designated to participate as a party in this proceeding.

II. INSTRUCTIONS

1. The singular includes the plural and the plural includes the singular.
2. The Consumer Advocate is requested to furnish all information in its possession and all information available to it, not merely such information as the Consumer Advocate knows of its own personal knowledge but also of knowledge that is available to it, its representatives, attorneys and agents, by reasonable inquiry.
3. If the Consumer Advocate is unable to answer the following discovery requests completely, answer to the extent possible, specifically stating the reason for the inability to answer the remainder and stating whatever information or knowledge you have concerning the unanswered portion.
4. These discovery requests shall be deemed continuing and call for supplementary responses in the event new or additional information or documents are acquired.

III. FIRST SET OF DISCOVERY REQUESTS

1. State the Consumer Advocate's position on the issue of whether asset management fees received by Nashville Gas should be included in Nashville Gas' Incentive Plan Account.

RESPONSE:

2. With respect to the position stated in response to the foregoing discovery request:

RESPONSE:

(a) Identify each and every factual basis relied upon by the Consumer Advocate in reaching such position;

RESPONSE:

(b) Identify each and every legal basis relied upon by the Consumer Advocate in reaching such position;

RESPONSE:

(c) Identify each and every witness the Consumer Advocate intends to call to support such position; and

RESPONSE:

(d) Identify each and every document relating to, or reviewed or relied upon in reaching, such position.

RESPONSE:

3. State the Consumer Advocate's position on what structure or structures for the sharing of savings as between the Company and ratepayers will be proposed by the Consumer Advocate in this docket for utilization under the Company's Incentive Plan.

RESPONSE:

4. With respect to the position stated in response to the foregoing discovery request:

RESPONSE:

(a) Identify each and every factual basis relied upon by the Consumer Advocate in reaching such position(s);

RESPONSE:

(b) Identify each and every legal basis relied upon by the Consumer Advocate in reaching such position(s);

RESPONSE:

(c) Identify each and every witness the Consumer Advocate intends to call to support such position(s); and

RESPONSE:

(d) Identify each and every document relating to, or reviewed or relied upon in reaching, such position(s).

RESPONSE:

5. Identify each and every change to Nashville Gas' Incentive Plan or Incentive Plan Account which the Consumer Advocate intends to or will propose in this docket.

RESPONSE:

6. With respect to each such change identified in response to the foregoing discovery request:

RESPONSE:

(a) Identify each and every factual basis relied upon by the Consumer Advocate in proposing such change;

RESPONSE:

(b) Identify each and every legal basis relied upon by the Consumer Advocate in proposing such change;

RESPONSE:

(c) Identify each and every witness the Consumer Advocate intends to call to support such proposed change; and

RESPONSE:

(d) Identify each and every document relating to, or reviewed or relied upon in reaching, such proposed change.

RESPONSE:

7. To the extent not provided in response to the foregoing questions, identify each and every matter or issue about which the Consumer Advocate intends to present evidence or argument in this proceeding and the Consumer Advocate's position thereon.

RESPONSE:

8. With respect to each matter, issue, or position identified in response to the foregoing discovery request:

RESPONSE:

(a) Identify each and every factual basis relied upon by the Consumer Advocate with respect to such matter, issue, or position;

RESPONSE:

(b) Identify each and every legal basis relied upon by the Consumer Advocate with respect to such matter, issue, or position;

RESPONSE:

(c) Identify each and every witness the Consumer Advocate intends to call with respect to such matter, issue, or position;

RESPONSE:

(d) Identify each and every document relating to, or reviewed or relied upon by the Consumer Advocate with respect to such matter, issue or position.

RESPONSE:

9. With respect to each person you expect to call as a witness, including any expert witness, regarding this matter, state or provide:

RESPONSE:

(a) The witness' full name and work address;

RESPONSE:

(b) The subject matter (or subject matters) about which the witness is expected to testify;

RESPONSE:

(c) The substance of the facts and opinions to which any expert is expected to testify;

RESPONSE:

(d) A summary of the grounds or basis of each opinion to which such witness is expected to testify;

RESPONSE:

(e) Whether or not the expert has prepared a report, letter, or memorandum of his/her findings, conclusions, or opinions;

RESPONSE:

(f) The witness's background information, including current employer, education, professional and employment history, and qualifications within the field in which the expert is expected to testify;

RESPONSE:

(g) An identification of any matter in which the expert has testified by specifying the name, docket number and forum of each such case, and the dates of the prior testimony;

RESPONSE:

(h) the identity of all documents shown to, delivered to, received from, relied upon, or prepared by any expert witness related to the witness' expected testimony in this case.

RESPONSE:

10. Identify all exhibits which the Consumer Advocate intends to introduce into evidence in this proceeding.

RESPONSE:

11. Identify each and every communication with any member of the TRA Staff or any current or former member of the Advisory Staff regarding the matters set for hearing in this proceeding and with respect to each:

RESPONSE:

(a) State the subject and substance thereof;

RESPONSE:

(b) Identify the date and means thereof; and

RESPONSE:

(c) Identify each and every document in the possession, custody, or control of the Consumer Advocate evidencing, relating or referring thereto.

RESPONSE:

12. Produce a copy of all documents identified in response to the foregoing discovery requests.

RESPONSE:

13. Identify each and every person who provided information or participated in the preparation of the responses to these discovery requests and indicate which responses each such person worked on or provided information for.

RESPONSE:

This the 14 day of November, 2005.



R. Dale Grimes (#6223)
Bass, Berry & Sims PLC
Amsouth Center
315 Deaderick Street, Suite 2700
Nashville, TN 37238-3001

(615) 742-6200

Attorney for Nashville Gas Company


James H. Jeffries IV
Moore & Van Allen, PLLC
Bank of America Corporate Center
100 N. Tryon Street, Suite 4700
Charlotte, North Carolina 28202-4003
(704) 331-1079
*by RDC
a/permission*

Attorney for Nashville Gas Company

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of NASHVILLE GAS COMPANY'S FIRST SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS TO THE CONSUMER ADVOCATE was served upon the parties via hand delivery, addressed as follows:

Timothy Phillips
Joe Shirley
Assistant Attorney General
Office of the Consumer Advocate and Protection Division
Post Office Box 20207
Nashville, Tennessee 37202

Aaron Rochelle
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

J. Richard Collier
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

This the ____ day of November, 2005.

A handwritten signature in black ink, appearing to read "R. Dale Grimes", written over a horizontal line.

R. Dale Grimes